

UNITED STATES DISTRICT COURT

for the
District of Maryland

United States of America

v.

GRANT L. KLEIN

Case No. 13-2770 WC

2:13-mj-117-1

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/25/2013-8/05/2013 in the county of Prince George in the
District of Maryland, the defendant(s) violated:

Code Section
18:2252A(a)(2) and (b)(1)
18: 2252A(a)(5)(B)

Offense Description
Receipt/attempted receipt of child pornography
Access with intent to view child pornography

This criminal complaint is based on these facts:

As stated in the attached affidavit of affiant, SA Elizabeth A. Weiland, Federal Bureau of Investigation.

☒ Continued on the attached sheet.

Elizabeth A. Weiland
Complainant's signature

SA Elizabeth A. Weiland, Federal Bureau of Investigation
Printed name and title

Sworn to before me and signed in my presence.

Date: 11/21/2013 5:15 pm

William Connelly
Judge's signature

City and state: Greenbelt, Maryland

William Connelly, Chief United States Magistrate Judge
Printed name and title

THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

GREENBELT DIVISION

UNITED STATES OF AMERICA

v.

GRANT L. KLEIN

CASE NO. 13-27704

UNDER SEAL

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

Your Affiant, Elizabeth A. Weiland, Special Agent, Federal Bureau of Investigation, Linthicum, MD, Violent Crimes Against Children Section, Major Case Coordination Unit, being duly sworn, hereby deposes and states as follows:

1. Your Affiant has been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) since 2007, and is currently assigned to the FBI Headquarters, Violent Crimes Against Children Section, Major Case Coordination Unit. I am currently investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience through training in seminars, classes, and everyday work related to these types of investigations. I have participated in the execution of numerous warrants involving the search and seizure of computers, computer equipment, software, and electronically stored information. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. The instant investigation involves a website of a format commonly known as an image board, which allowed users to upload images to, and download images from, the website.

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The primary purpose of the website was the advertisement and distribution of child pornography. According to statistics posted on the site, as of June 25, 2013, the site contained 3,317 registered members, 5,354 images that were uploaded, and 40 galleries uploaded with 2,362 images. The website operated on a computer network designed to allow users to communicate anonymously, which obscured a user's true IP Address by routing users' communications through multiple computers.

3. Between approximately July 31, 2013, and August 5, 2013, the website under investigation operated on a computer server located in the District of Maryland. During that time period, pursuant to court authorization of the United States District Court for the District of Maryland, each time a user accessed a section of the website under investigation where child pornography could be accessed, one or more communications were sent to a computer either known to or controlled by the Government, that would help identify the computer's actual IP address, a unique session identifier to distinguish the data from that of other computers, the type of operating system running on the computer, and the computer's Media Access Control (MAC) address.

4. On August 04, 2013, from approximately 4:06am until 4:08am UTC, an unknown user utilized Internet Protocol (IP) address 50.133.199.243 to access the website under investigation. During this time period, the user accessed approximately six (6) web pages that contained 171 images. Of the 171 images viewed during this time period, approximately 65 of these images related to child exploitation material or similar content. The images included the following:

- a. 5762_hrjustin001.jpg – image depicts a clothed pre-school age child of indeterminate sex standing between the legs of a partially clothed adult male who is

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naked from the waist down. The adult male appears to be sitting in a chair near a desk or computer. The adult male's left hand is visibly touching his erect penis and placing it against the minor's mouth.

b. 5763_001M013Copy.jpg – image depicts a partially clothed infant male, with a pacifier lying on his chest, naked from the waist down laying on his back with his genitals exposed to the camera. A partially clothed adult male, naked from the waist down, is also visible in the picture. The adult male's erect penis is visibly penetrating the anus of the minor.

c. 5765_2112.jpg – image depicts an infant of indeterminate sex apparently asleep. An adult male penis has been placed into the infant's open mouth.

d. 5772_2chub15.jpg – image depicts a naked pre-pubescent female and another naked pre-pubescent child of indeterminate gender. The minor female is laying on her back on a bed with her feet toward the camera and her body and legs positioned in such a way that her genitals are exposed to the camera. Additionally, what appears to be handcuffs or shackles are clearly visible on both ankles and the right wrist. Her left arm/wrist is obscured by the second child in the picture.

5. A check conducted of publically available databases showed that IP address 50.133.199.243 is assigned to Internet Service Provider (ISP) Comcast Communications. On August 4, 2013, a subpoena was served upon Comcast Communications for information related to the customer assigned IP address 50.133.199.243 on August 4, 2013 at 3:58am UTC and at 4:06am UTC. On August 6, 2013, Comcast Communications, in response to the issued subpoena, provided the following information related to the customer assigned the captioned IP address

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during the time period requested:

Name: Susan Klein

Address: 71 Western Avenue Apartment 101, Brattleboro, VT

6. On November 21, 2013, law enforcement agents executed a search warrant at 71 Western Avenue, Apartment 101, Brattleboro, VT. During the search, agents interviewed occupant Grant L. Klein ("KLEIN"). KLEIN admitted to using the computer network on which the website under investigation operated, which network he referred to by name, and to accessing, viewing and downloading child pornography on multiple websites that operated on that network. He also admitted to masturbating to child pornography and stated his preferred age was 12-16. Klein pointed agents to a computer in the home with a missing hard drive and told agents that in August of 2013 he removed the hard drive and physically destroyed it because he was concerned about having "evidence" around. Klein further stated that after destroying that hard drive, he subsequently used a smartphone device to access websites including child pornography. Images depicting minors, including prepubescent minors, engaged in sexually explicit conduct, were located on a smartphone in the home that Klein admitted was his.

7. Based upon the foregoing, your Affiant respectfully requests that this court issue an arrest warrant for Grant L. Klein for the charges of receipt/attempted receipt of child pornography

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in violation of Title 18 U.S.C. § 2252A(a)(2) and (b)(1) and access with intent to view child pornography in violation of Title 18 U.S.C. § 2252A(a)(5)(B).

Elizabeth A. Weiland

Elizabeth A. Weiland
Special Agent
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN BEFORE ME
THIS 21ST DAY OF NOVEMBER, 2013

William Connelly

HONORABLE WILLIAM CONNELLY
CHIEF UNITED STATES MAGISTRATE JUDGE

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